

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,  Plaintiff,  v.  PAUL ERICKSON,  Defendant.	4:19-cr-40015  <b>MOTION FOR CONTINUANCE</b>
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Defendant Paul Erickson, through his attorney of record, Clint Sargent, moves this Court for a continuance of the April 16, 2019 Jury Trial until on or after August 14, 2019, along with a corresponding continuance of all other dates and deadlines.

This is a complex case. The allegations in the indictment include conduct over a 22-year time frame from 1996 to 2018, involving multiple witnesses from dozens of states and relate to complex issues of trust and tax law. On February 19, 2019, defense counsel received production of approximately 1,500 pages of discovery from the Government. Due to the number of individuals involved, the volume of discovery, the nature of the prosecution, and the complex questions of fact and law, it is unreasonable to expect adequate preparation for pretrial proceedings or for the trial itself within the time limits set by the Court's current scheduling order.

The Government, through Assistant United States Attorney Jeff Clapper, advises it has no objection to this Motion.

Mr. Erickson has authorized counsel to file this Motion. Counsel for Mr. Erickson will file Defendant's Statement in Support of Postponement with the Court upon receipt.

Dated this 4<sup>th</sup> day of March 2019.

/s/ Clint Sargent  
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**CERTIFICATE OF SERVICE**

This is to certify that I have served a copy of the foregoing upon counsel using the ECF filing system which will automatically send e-mail notifications of such filing to opposing counsel, Jeff Clapper.

Dated this 4<sup>th</sup> day of March 2019.

/s/ Clint Sargent  
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